

EXHIBIT B

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December 16, 2019

Via Electronic Mail

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546 5th Ave
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Re: *Giuffre v. Dershowitz*, 19-cv-03377-LAP

Dear Counsel:

Enclosed herewith please find a copy of Plaintiff Virginia Giuffre's Rule 26 Initial Disclosures. Pursuant to the parties' agreement on documents to be produced as part of the Rule 26 disclosures, we are posting to a secure sharefile site for you to download the following sets of documents:

1. Documents produced by Virginia Giuffre in the *Giuffre v. Maxwell* matter. Many of these documents continue to be protected by the confidentiality order in that case and are being produced herewith subject to the Court's direction that this is for use only in this case and that only materials that have been unsealed by the Court may be publicly disclosed.
 2. Documents produced by non-party Virginia Giuffre in the *Edwards v. Dershowitz* matter.
 3. Documents produced by non-party Victims Refuse Silence in the *Giuffre v. Maxwell* matter.
 4. Virginia Giuffre's deposition transcripts and transcript exhibits from the *Giuffre v. Maxwell* matter. Again, much of these transcripts and many of the exhibits remain under the confidentiality order in that case and are being produced herewith subject to the Court's direction that this is for use only in this case and that only materials that have been unsealed by the Court may be publicly disclosed.
 5. Flight logs in Plaintiff's possession from Epstein's planes;

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6. Records obtained from Mar-a-Lago.

When these records have finished uploading to the sharefile site, you will receive an email invitation to create a log-in and password so you can download the files. Please note that we have left the original bates numbers on the documents where applicable so the provenance of the documents is apparent, but we have also included a bates number corresponding to this case that will start with the prefix "VRG."

We are still working on compiling a list of Plaintiff's health providers and will forward that on when it is ready hopefully later this week.

If you have difficulty accessing any files or have any questions, please let me know.

Sincerely,



Nicole Jo Moss